

# LAW OFFICES OF N.M. GEHI, P.C.

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Robert L. Geltzer  
1556 Third Avenue  
New York, NY 10128

December 6, 2011

**RE: Lalita Devi Sukhramn and Eshwar Nauth Sukhramn**  
**CHAPTER 7**  
**CASE NO. 11-42627(JF)**

Dear Mr. Geltzer,

We submitted the letter to the Court to keep the Court apprised of your intimidation tactics, which was clear by the way you asked for information regarding Mr. Gehi's television program. Of course as a member of the public you are free to watch the show, but we are not required to give you that information.

The stipulation that you sent to the court does not include many of the changes agreed upon during our phone conversation. I specifically revised the stipulation with all the changes we agreed upon that included changing the time schedule for the examinations so they would be done in one day and other small revisions of the language in the stipulation. It seemed that your only objection to the revised stipulation was the paragraph preserving our clients' rights to oppose any future applications for documents. However, you are also requesting the inclusion of a paragraph that would allow you to make requests for documents at any time during or after the examinations and our request is simply an acknowledgment that our clients do not lose their right to object to any future requests for documents as a result. It is not clear how the inclusion of this paragraph violates the principle of *inclusio unus est exclusio alterius*. We will not be signing the stipulation with out the changes we agreed upon or without the paragraph preserving our clients' rights.

Regards,

A handwritten signature in black ink, appearing to be 'Rita M. Espinosa Arguello', with a stylized, flowing script.

Rita M. Espinosa Arguello, Esq.

CC: Marylou Martin  
U.S. Trustee's Office  
271 Cadman Plaza East, Room 4529  
Brooklyn, NY 11201

Hon. Jerome Feller  
U.S. Bankruptcy Court, EDNY  
Conrad B. Duberstein Courthouse  
271 Cadman Plaza East – Suite 1595  
Brooklyn, NY 11201